

HOFFMAN ROTH & MATLIN, LLP
ATTORNEYS AT LAW
505 Eighth Avenue, Suite 1704
New York, NY 10018

JAMES A. ROTH
BARRY M. HOFFMAN
WILLIAM S. MATLIN

JOSHUA HOFFMAN
DANIELLE OLVERD

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: OCT 03 2014
DATE FILED OCT 03 2014

TEL: (212) 964-1890
FAX: (212) 964-4306
E-MAIL: hoffmanroth@yahoo.com
(NOT FOR SERVICE OF LEGAL PAPERS)

SOFIA ZOULIS - OFFICE MANAGER

October 2, 2014

VIA FACSIMILE (212) 805-0426
The Honorable Laura Taylor Swain
United States District Judge
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007-1312

MEMO ENCLOSED

Re: In Re Mission Construction
Civil Action No.: 1:10-CV-4262 (LTS)(HBP) (the Consolidated Action)

Dear Judge Swain:

My firm represents defendant Rybak Development and Construction Corp., ("Rybak") in the above-referenced consolidated actions. In accordance with the Court's September 3, 2014 we hereby request a thirty (30) day extension of time in which to complete the settlement of this matter. Once a fully executed global settlement agreement has been received from all parties, we will provide a copy of same to the Court for the purposes of enforcement, if necessary.

As of this writing, plaintiff USAA Casualty Insurance Company a/s/o Adelman has exchanged executed general releases and a global settlement agreement with all parties. We await executed closing papers from the two remaining plaintiffs. Defendants Rybak, Namibia and Smotrich have also signed the global settlement agreement while defendants LWM and Silman have not.

I appreciate the Court's time and attention to this matter.

Very truly yours,

William S. Matlin

The reinstatement
portion of the
September 3, 2014, Order
of Dismissal is
extended through
November 3, 2014.

Attachments

cc: All Counsel (VIA E-MAIL)

SO ORDERED:

Laura Taylor Swain
HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE